

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Jeffrey Walter	§	
An individual,	§	
Plaintiff	§	
 	§	
v.	§	Civil Action No. 09-3939
 	§	
Ville de Paris (The City of Paris),	§	
A Municipal Commune of France,	§	
Defendant	§	

DECLARATION OF ATTORNEY TRAVIS CRABTREE

I, Travis Crabtree, declare as follows:

1. "My name is Travis Crabtree. I am an attorney licensed to practice in this District. I am one of the attorneys of record for Plaintiff Jeffrey Walter. I am authorized to make this declaration on its behalf. I have personal knowledge of the contents of this declaration and the facts stated herein are true and correct.
2. I am an attorney and have been licensed to practice law in the State of Texas since November 2000. I am a member at Looper Reed & McGraw, P.C. ("LRM"). Plaintiff entered into an agreement with LRM under which LRM would represent it in this action against Defendant.
3. In arriving at my opinions set forth herein, I relied on and analyzed the eight factors set forth in Rule 1.04 of the Texas Disciplinary Rules of Professional Conduct, *reprinted in TEX. GOV'T CODE ANN. tit. 2, subtit. G app. A (Vernon 1998)*. See also *Arthur Andersen & Co. v. Perry Equip. Corp.* 945 S.W.2d 812, 818 (Tex. 1997).
4. I am familiar with the attorneys' fees customarily charged by attorneys in this District for commercial litigation such as this. My hourly rate on this matter has been between \$300 and \$325. When feasible, I have used associates with lower billing rates. I am also familiar with the attorney

services that are reasonable and necessary for the proper prosecution of a lawsuit such as this. I have been the local attorney who personally performed the majority of legal services necessary for the prosecution of the claims in this lawsuit, or I personally supervised same for those at LRM. I have also been working with competent counsel who have been admitted pro hac vice to assist Mr. Walter.

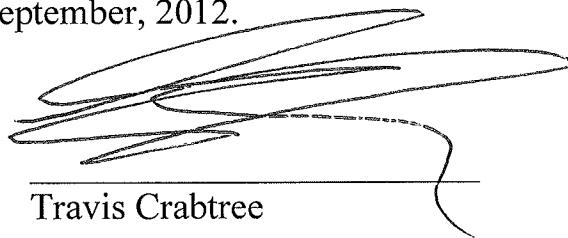
5. Based on my experience, and for the reasons set forth herein, it is my opinion that the amount of \$14,750 is reasonable, customary, and necessary attorney fee for the services provided by me to prosecute the claims in this lawsuit against Defendant. This amount includes counseling the client, drafting pleadings, attending numerous status conferences, assisting with service under the Hague Convention, following up on securing service, filing pleadings to obtain a default, attending the hearing to secure a default judgment, and drafting the affidavits and pleadings.

6. Should Defendant seek to overturn this judgment, then, in my opinion, the reasonable and necessary fees to oppose such efforts would be at least \$5,000.

7. Should Defendants seek to appeal a final judgment to the Fifth Circuit or elsewhere, then in my opinion, the reasonable and necessary fees would be at least \$35,000.

8. Should Defendants seek a writ of certiorari with the Supreme Court of the United States and Mr. Walter is required to respond, it is my opinion that a reasonable and necessary fee would be at least \$15,000. Should our efforts to represent Mr. Walter require us to brief the merits to the Supreme Court, then the reasonable fee would be at least another \$45,000.

Executed on this 13th day of September, 2012.



The image shows a handwritten signature in black ink, which appears to be "Travis Crabtree". The signature is fluid and cursive, with a long horizontal stroke on the left and a more vertical, stylized part on the right.

Travis Crabtree